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March 17, 2016

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**By E-Mail & Overnight Delivery**

Hon. Martin Glenn, USBJ  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004-1408

Re: In re Residential Capital, LLC et al.  
United States Bankruptcy Court  
Southern District of New York  
Jointly Administered Under Case No. 12-12020 (MG)

Dear Judge Glenn:

This firm is counsel to the ResCap Borrower Claims Trust (the “Trust”).

On December 17, 2015, the Court entered the *Case Management and Scheduling Order for ResCap Borrower Claims Trust’s Seventy-Fifth Omnibus Objection to Claims (Solely As It Relates to Claim No. 3862 Filed By Rhonda Gosselin* [Docket No. 9422] (the “Case Management Order”) setting forth a schedule for the completion of fact and expert discovery in relation to the Trust’s objection to the proof of claim filed by Rhonda Gosselin (“Ms. Gosselin”). Pursuant to the Case Management Order, all fact discovery was to be completed by March 15, 2016 and all expert discovery was to be completed by April 29, 2016.

As the Court is aware, Ms. Gosselin’s counsel, Laird Heal (“Mr. Heal”), withdrew from the case in October 2015 due to health issues, and the Case Management Order was entered after his withdrawal. Mr. Heal has now decided to resume representing Ms. Gosselin and has filed a notice of appearance in the case [Docket No. 9479]. Given Mr. Heal’s absence during the discovery period, the parties have agreed, subject to Court approval, to an extension of the deadlines for the completion of discovery.

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As a result, the parties have agreed to the following modifications to the Case Management Order:

- All fact discovery (including responses to propounded discovery) shall be completed no later than April 30, 2016.
- By April 15, 2016, the parties (i) shall identify any experts to provide testimony at trial and (ii) will provide the other party with copies of the report from said expert.
- All expert discovery shall be completed no later than May 16, 2016.
- The proposed Joint Pretrial Conference Order shall be submitted no later than June 10, 2016.
- The parties agree to a six (6)-hour timed trial, with three hours allocated to each side.

The parties request that the Court amend the Case Management Order to reflect this modified discovery schedule, or, should the Court require a status conference prior to amending the Case Management Order, then the parties would respectfully request that the Court schedule a status conference for March 22, 2016 at 10:00 a.m.

Respectfully submitted,

Jordan A. Wishnew

cc: Laird Heal (via e-mail)

MEMORANDUM ENDORSED. EXTENSION OF  
DEADLINES GRANTED.  
IT IS SO ORDERED.

DATED: MARCH 17, 2016

/s/Martin Glenn  
UNITED STATES BANKRUPTCY JUDGE